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Raymond J. Santarelli
General Counsel

July 2, 2019

Cyrus R. Pitre, Director
Office of Enforcement Counsel
Pennsylvania Gaming Control Board
303 Walnut Street, 10th Floor
Harrisburg, PA 17101-1803

RE: Stadium Casino Project

Dear Mr. Pitre:

Please accept this correspondence on behalf of the Delaware River Port Authority. On June 24, 2019, you corresponded with DRPA Deputy Chief Executive Officer Maria Wing concerning the above-referenced project. In your correspondence, you requested the DRPA's position regarding the proposed I-76 on ramp, which would carry traffic away from DRPA's Walt Whitman Bridge, westbound on Interstate 76. Your correspondence advised, "the Board is interested in the opinion of the Delaware River Port Authority regarding the I-76 on ramp." Specifically, you inquire whether:

- DRPA supports the on ramp project?
- DRPA does not support the ramp project?
- DRPA has no opinion regarding the on ramp project?
- DRPA needs more information to have an opinion and, if so, what information is needed?

For the reasons previously discussed at our January 30, 2018 meeting, at this time, DRPA does not support this ramp project. The proposed ramp project will not serve DRPA's core business of providing service to our bridge users. DRPA will not expend any funds in furtherance of the proposed ramp project, whether for construction, maintenance, or otherwise.

DRPA will not be attending on July 10, 2019 to present testimony to the Gaming Board on this subject. You may include this correspondence in the record.

Sincerely,


Raymond J. Santarelli
General Counsel

RJS/dvm

cc: John T. Hanson, DRPA Chief Executive Officer
Maria J. Wing, DRPA Deputy Chief Executive Officer
Michael P. Venuto, DRPA Chief Engineer



CITY OF PHILADELPHIA

OFFICE OF THE MANAGING DIRECTOR

BRIAN ABERNATHY
Managing Director

1401 John F. Kennedy Boulevard
Suite 1430
Philadelphia, PA 19102-1683

July 3, 2019

Cyrus R. Pitre
Office of Enforcement Counsel
Pennsylvania Gaming Control Board
303 Walnut St, 10th Fl
Harrisburg, PA 17101
Via email to cpitre@pa.gov

RE: Proposed Ramp to I-76 Westbound in the City of Philadelphia/Stadium Casino LLC

Dear Mr. Pitre:

Thank you for the opportunity for the City of Philadelphia to provide comments on the Category 2 License Renewal for Stadium Casino LLC. The focus of these comments will be specific to the issue of the I-76 ramp that was included in Stadium Casino LLC's gaming license by the Pennsylvania Gaming Control Board.

It is my understanding that prior traffic studies made on behalf of the licensee have suggested that the Stadium Casino project will have traffic impacts that, while not insignificant, are rather minor in scale relative to the design capacity of area streets.

However, any traffic impacts of this project must be considered holistically within the broader context of the overall area – an area that frequently experiences large traffic volumes associated with special events, increased port development, and poor connectivity between interstate highways that requires traffic to often use City streets to move from one highway to another.

Access Challenges in Sports Complex

The City of Philadelphia believes that existing highway ramps in the Sports Complex area, which connect City streets with I-76, are insufficient for providing the capacity and flexibility desired to effectively manage traffic in the area.

Consider the following:

- There are 4 off-ramps from 76-W to area streets – Front Street, 7th Street, Broad Street, and Penrose Avenue.
- There are 2 off-ramps from 76-E to area streets – Broad Street and Packer Avenue.
- There are 5 on-ramps from area streets to 76-E – Penrose Avenue, two at Broad Street, Packer Avenue, and Front Street.

- There is just one on-ramp in the immediate area to 76-W – accessed exclusively from northbound Broad Street. Accessing additional 76-W ramps requires lengthy detours.
- There are no direct ramps between either direction of Interstate 95 and 76-W. Traffic exiting 95 destined for 76-W must travel on City streets to reach the sole ramp at Broad Street.

The existing ramp configuration provides ample opportunities for motorists to take Interstate 76 into this busy area to take advantage of all it has to offer; however, it provides fewer options for these motorists to leave City roadways afterward – particularly if one’s destination is not in New Jersey. Furthermore, the sole existing on-ramp to 76-W can only be accessed from northbound traffic on Broad Street, and its sharply curved design does not meet modern standards.

Ramp Enhancements Needed

The Sports Complex and adjacent areas are booming with additional development and economic activity. In addition to the three major venues and the Stadium Casino project, plans are underway for an additional entertainment venue and office building on Pattison Avenue. The Navy Yard continues to attract job growth and investment. PhilaPort is also actively expanding its footprint and activity near the Packer Avenue Marine Terminal, which will surely generate additional car and truck traffic on City streets trying to access area highways or travel between facilities.

To ensure that the City has the ability to manage all of the traffic associated with the current and proposed activity in the area, it is critical that a second point of access to I-76 Westbound be constructed in the area. Having just one point of access at northbound Broad Street – a ramp with a sharp 180-degree curve that does not meet modern design standards – is not adequate and does not provide any flexibility for managing traffic patterns. As a result, much of the traffic destined for points northwest of the complex must be diverted onto I-95 along an already congested highway that will soon be the subject of many years of reconstruction activity.

However, while the City fully supports a second ramp to serve the area, the City also recognizes that the location under discussion by the Gaming Control Board at 7th Street has challenges of its own. It is my understanding that the dimensions of that property would require a number of design waivers from federal standards. That location would also place merging traffic in very close proximity to the off-ramp at Broad Street, creating the potential for a dangerous weave condition between merging and exiting traffic on 76.

The City does not control the land specific to the 7th Street location, does not have responsibility for the design, maintenance, or construction of any ramp at that location, nor has the ability to require private developers to make or fund improvements to interstate highways as a condition of approving their projects.

However, the City hopes that in the years ahead additional improvements will be made by the relevant transportation agencies, at appropriate and feasible locations, to enhance connectivity and create additional options for managing traffic in the area with minimal adverse impacts on

residents. As PennDOT and the DRPA plan for how to rebuild and redesign these two interstates in the future, the City strongly desires that traffic management in the entire area will be studied holistically, and that improvements will be made to enhance the overall connectivity between the entire Sports Complex area, the port, and these two vital interstate highways.

Thank you once again for providing the City of Philadelphia with the opportunity to share its perspective with the Board.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian Abernathy', with a long horizontal line extending to the right.

Brian Abernathy
Managing Director

cc: Michael Carroll, P.E., Deputy Managing Director for Transportation, Infrastructure and Sustainability